

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 1:12-cv-1075 (LMB) (IDD)

ELIJAH JACKSON, et al.

Defendants.

STATUS REPORT

COMES NOW the United States of America and respectfully advises the Court of the status of this matter as required by the Court's order of October 1, 2013. This matter has been resolved as to all defendants except Doris Taylor. Taylor, who is proceeding pro se in this matter, may have a lien against the property that is the subject of this foreclosure action. If Taylor has a lien, it is junior to the first-filed lien of the United States. The first-filed lien of the United States dwarfs the value of the property.

The undersigned counsel for the United States drafted a stipulation for entry of judgment against Taylor. Under this draft stipulation, Taylor would agree to a judgment providing that she has no interest superior to the interest of the United States in the property. The undersigned counsel for the United States handed this draft stipulation to Taylor before the final pretrial conference on September 19, 2013. Taylor suggested in open court on that day that she would sign the stipulation. The undersigned counsel telephoned Taylor during the week of September 23 and asked her

if she would sign the stipulation. She responded that she most likely would. The undersigned counsel telephoned Taylor again on September 30 and asked the same question. Taylor said she would sign the stipulation right away and fax and mail it to the undersigned counsel. The undersigned counsel has not yet received either the faxed or mailed stipulation. As soon as the undersigned counsel receives it, he will file it with the court.¹

DATED: October 3, 2013.

KATHRYN KENEALLY
Assistant Attorney General
Tax Division

/s/
W. BRADLEY RUSSELL
Department of Justice, Tax Division
Appearing pursuant to 28 U.S.C. § 517
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Counsel for the United States

¹ Due to a lapse in appropriations for the federal government, the undersigned counsel and Assistant United States Attorney Bob Coulter may be prohibited from working on certain days. Thus, it is possible that the undersigned counsel's office will receive the stipulation on a day on which the undersigned counsel is prohibited from working. If that happens, the undersigned counsel will file the stipulation as soon as he is authorized to work. In the event Coulter is not authorized to work at that time, the undersigned counsel will file the stipulation himself, without the signature and assistance of Coulter.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a true and correct copy of the foregoing document to be served on the 3rd day of October 2013, via first class mail, postage prepaid, addressed to the following:

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Date: October 3, 2013.

/s/

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